

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ALGEBRAIX LLC,

Plaintiff/Counterclaim
Defendant,

v.

INTERNATIONAL BUSINESS
MACHINES CORPORATION,

Defendant/Counterclaim
Plaintiff,

v.

PERMISSION.IO INC.,

Third-Party Defendant.

Civil Action No. 2:24-CV-00999-JRG

JURY TRIAL DEMANDED

**ALGEBRAIX LLC’S AND INTERNATIONAL BUSINESS MACHINES
CORPORATION, INC.’S JOINT UNOPPOSED MOTION TO EXTEND TIME TO
SERVE DISCLOSURES UNDER P.R. 3-1 AND 3-2**

Plaintiff Algebraix LLC (“Algebraix”) and Defendant/Counterclaim Plaintiff International Business Machines Corporation (“IBM”) respectfully request that the Court extend the deadlines to comply with certain disclosures under P.R. 3-1 and 3-2 by two weeks, as follows:

Event	Current Deadline	Proposed Deadline
P.R. 3-1(a) Disclosure of Algebraix’s and IBM’s Asserted Claims	March 12, 2025	March 12, 2025
P.R. 3-1 Disclosure of Algebraix’s and IBM’s Infringement Contentions (and P.R. 3-2 Document Production Accompanying Disclosure)	March 12, 2025	March 26, 2025

Algebraix and IBM request this extension in light of various scheduling conflicts on the attorney teams representing them. This requested extension of time is not for the purpose of delay and will not prejudice the parties. Counsel for Algebraix and IBM have conferred with Permission.io Inc. (“Permission.io”), and Permission.io does not oppose this extension.

Dated: March 5, 2025

Respectfully Submitted,

/s/ Karim Oussayef by permission Andrea L. Fair

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CERTIFICATE OF CONFERENCE

I certify that on March 3, 2025, counsel for IBM and Algebraix conferred via email regarding the subject matter of this motion with counsel for Permission.io, who indicated it does not oppose the relief requested.

/s/ Karim Oussayef
Karim Oussayef

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on March 5, 2025.

/s/ Karim Oussayef
Karim Oussayef